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2009R00363:sam

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND BY

AT BALTIMORE
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND
DEPUTY

UNITED STATES OF AMERICA

v.

CRAIG ALLEN COREY II,
and
JACOB TYLER,
Defendants.

CRIMINAL NO. JFM-09-0512
:
:
: (Conspiracy Related to Interstate
: Prostitution, 18 U.S.C. § 371; Interstate
: Transportation for Prostitution, 18
: U.S.C. § 2421; Enticement, 18 U.S.C. §
: 2422(a); Sex Trafficking by Force, Fraud
: and Coercion, 18 U.S.C. § 1591; Sex
: Trafficking of a Minor, 18 U.S.C. § 1591;
: Distribution of Child Pornography,
: 18 U.S.C. § 2252(a)(2); Narcotics
: Conspiracy, 21 U.S.C. § 846;
: Distribution of BZP, 21 U.S.C. §§
: 841(a)(1); Aiding & Abetting, 18 U.S.C.
...oOo... § 2; Forfeiture).

SUPERSEDING INDICTMENT

COUNT ONE
(Conspiracy)

The Grand Jury for the District of Maryland charges that:

At various times relevant to this Indictment:

Introduction

1. Defendant **CRAIG ALLEN COREY II** was a resident of Millersville, **MARYLAND** and a Private First Class with the United States Army. **COREY** leased and lived in an apartment on Millwright Court in Millersville (hereinafter "**COREY's** Millersville apartment").

2. Co-conspirators Robert Harris, a/k/a "Little Rob," Richard Johnson, a/k/a "Little Richy," and defendant **JACOB TYLER** were residents of Ohio and associates of **COREY**.

3. Craigslist is a centralized network of online communities, featuring free and paid online classified advertisements, with sections devoted to various topics including goods and services for sale.

4. "Jane Doe 1" was a female resident of Ohio and was 18 years old.

5. "Jane Doe 2" was a female resident of Ohio and was 16 years old.

6. "Jane Doe 3" was a female resident of Ohio and was 21 years old.

The Conspiracy

7. Beginning at least in or about January, 2009 through in or about April, 2009, in the District of Maryland, and elsewhere, the defendants,

**CRAIG ALLEN COREY II,
and
JACOB TYLER**

did knowingly and willfully combine, conspire, confederate and agree with others both known and unknown to the Grand Jury to:

(a) knowingly transport any individual in interstate commerce with intent that such individuals engage in prostitution in violation of Title 18, United States Code, § 2421; and

(b) knowingly persuade, induce, entice and coerce any individual to travel in interstate commerce to engage in prostitution in violation of Title 18, United States Code, § 2422(a).

Manner and Means of the Conspiracy

8. It was part of the conspiracy that **CRAIG ALLEN COREY II**, Robert Harris, a/k/a "Little Rob," Richard Johnson a/k/a "Little Richy," **JACOB TYLER**, and others both known and unknown to the Grand Jury, operated an interstate prostitution business.

9. It was part of the conspiracy that **CRAIG ALLEN COREY II**, Robert Harris, a/k/a "Little Rob," Richard Johnson a/k/a "Little Richy," **JACOB TYLER**, and others both known and unknown to the Grand Jury, used Craigslist and other web-based services to persuade, encourage, entice and recruit females to serve as prostitutes and promote their prostitution business.

10. It was part of the conspiracy that **CRAIG ALLEN COREY II**, Robert Harris, a/k/a "Little Rob," Richard Johnson a/k/a "Little Richy," **JACOB TYLER**, and others both known and unknown to the Grand Jury, advertised sexual services on Craigslist.

11. It was further part of the conspiracy that **CRAIG ALLEN COREY II**, Robert Harris, a/k/a "Little Rob," Richard Johnson a/k/a "Little Richy," **JACOB TYLER**, and others both known and unknown to the Grand Jury, used prepaid debit cards and aliases when posting Craigslist ads for sexual services in order to conceal their unlawful activities.

12. It was a part of the conspiracy that **CRAIG ALLEN COREY II**, Robert Harris, a/k/a "Little Rob," Richard Johnson a/k/a "Little Richy," **JACOB TYLER**, and others both known and unknown to the Grand Jury, photographed females in various states of undress for use in advertising sexual services on Craigslist.

13. It was part of the conspiracy that **CRAIG ALLEN COREY II**, Robert Harris, a/k/a "Little Rob," Richard Johnson a/k/a "Little Richy," **JACOB TYLER**, and others both known and unknown to the Grand Jury, would use cellular telephones and the internet to facilitate prostitution.

14. It was part of the conspiracy that **CRAIG ALLEN COREY II**, Robert Harris, a/k/a "Little Rob," Richard Johnson a/k/a "Little Richy," **JACOB TYLER**, and others both

known and unknown to the Grand Jury, would travel from destinations within and outside of Maryland to facilitate their prostitution business.

15. It was part of the conspiracy that **CRAIG ALLEN COREY II**, Robert Harris, a/k/a "Little Rob," Richard Johnson a/k/a "Little Richy," **JACOB TYLER**, and others both known and unknown to the Grand Jury, would collect and share the cash proceeds of the prostitution business.

16. It was part of the conspiracy that **CRAIG ALLEN COREY II**, Robert Harris, a/k/a "Little Rob," Richard Johnson a/k/a "Little Richy," **JACOB TYLER**, and others both known and unknown to the Grand Jury, would use a portion of the prostitution proceeds to purchase illegal narcotics.

17. It was a part of the conspiracy that **CRAIG ALLEN COREY II**, Robert Harris, a/k/a "Little Rob," Richard Johnson a/k/a "Little Richy," **JACOB TYLER**, and others both known and unknown to the Grand Jury, distributed illegal narcotics to associates, to prostitutes, to customers and to others.

Overt Acts

18. In furtherance of the conspiracy, and to effect the objects thereof, **CRAIG ALLEN COREY II**, Robert Harris, a/k/a "Little Rob," Richard Johnson a/k/a "Little Richy," **JACOB TYLER**, and others both known and unknown to the Grand Jury, committed the following overt acts in the District of Maryland and elsewhere:

- a. On or about January 25, 2009, **JACOB TYLER** advertised two females on Craigslist as providing sexual services for a fee at **COREY's** Millersville apartment.
- b. On or about February 5, 2009, **JACOB TYLER** advertised a female on

Craigslist as providing sexual services for a fee at **COREY's** Millersville apartment.

c. On or about February 6, 2009, **CRAIG ALLEN COREY II** booked a female for travel by airplane from Ohio to Maryland so that the female could engage in commercial sex activities in Maryland.

d. On or about February 6, 2009, **CRAIG ALLEN COREY II** used a credit card with an address in the name of a relative to pay for travel for a female to travel from Ohio to Maryland so that the female could engage in commercial sex activities in Maryland.

e. On or about February 10, 2009, a coconspirator posted two Craigslist ads listing from an Internet Protocol address registered to **CRAIG ALLEN COREY II**, offering herself and another female as prostitutes under the monikers "Shawna" and "Veronica".

f. On or about February 10, 2009, **CRAIG ALLEN COREY II** used his personal email account that showed receipt of confirmation for payment of Craigslist advertisements for sexual services for a fee and inquiries from potential sex customers.

g. At some time between January and April 2009, **JACOB TYLER** brandished a firearm in a threatening manner against a sex customer at **COREY's** Millersville apartment.

h. At some time between January and April 2009, **JACOB TYLER** physically assaulted "Jane Doe 3."

i At some time between January and April 2009, **CRAIG ALLEN COREY II**, Richard Johnson, a/k/a "Little Richy," **JACOB TYLER**, and another co-conspirator drove from Maryland to Michigan to obtain illegal narcotics.

j. At some time between March and April 2009, Robert Harris, a/k/a "Little

Rob,” facilitated the transportation of a female from Ohio to Maryland to engage in commercial sex acts at **COREY’s** Millersville apartment.

k. At some time between March and April 2009, Robert Harris, a/k/a “Little Rob,” physically assaulted “Jane Doe 1.”

l. At some time between March and April 2009, Richard Johnson, a/k/a “Little Richy,” facilitated the transportation of a female from Ohio to Maryland to engage in commercial sex acts at **COREY’s** Millersville apartment.

m. At some time in April 2009, **CRAIG ALLEN COREY II** facilitated the transportation of “Jane Doe 2” from Ohio to Maryland to engage in commercial sex acts.

n. At some time in April 2009, co-conspirators took photographs of “Jane Doe 2” in various states of undress for use in Craigslist postings advertising sexual services for a fee at **COREY’s** Millersville apartment.

o. On or about April 20, 2009, **CRAIG ALLEN COREY II**, and other co-conspirators, posted an advertisement on Craigslist utilizing **COREY’s** name, a phone number and address registered to a relative of **COREY**, an Internet Protocol address registered to **COREY** and offering “Jane Doe 2” for sexual services for a fee in Anne Arundel County, Maryland under the moniker “Vanilla.”

p. On or about April 20, 2009, **CRAIG ALLEN COREY II**, and other co-conspirators, used Craigslist to instruct sex customers to call a phone number subscribed to “CRAIG CORUY.”

q. On or about April 20, 2009, **CRAIG ALLEN COREY II**, and other co-conspirators, posted a photograph of “Jane Doe 2” partially disrobed.

r. On or about April 21, 2009, **CRAIG ALLEN COREY II**, and other co-conspirators, posted an advertisement on Craigslist utilizing **COREY's** name, a phone number and address registered to a relative of **COREY**, an Internet Protocol address registered to **COREY** and offering "Jane Doe 2" for sexual services for a under the moniker "Vanilla."

s. On or about April 21, 2009, **CRAIG ALLEN COREY II**, and other co-conspirators, used Craigslist to instruct sex customers to call a phone number subscribed to "CRAIG CORUY."

t. On or about April 21, 2009, **CRAIG ALLEN COREY II**, and other co-conspirators, posted a photograph of "Jane Doe 2" partially disrobed.

u. On or about April 22, 2009, **CRAIG ALLEN COREY II**, and other co-conspirators, posted an advertisement on Craigslist utilizing **COREY's** name, a phone number and address registered to a relative of **COREY**, an Internet Protocol address registered to **COREY** and offering "Jane Doe 2" for sexual services for a fee under the moniker "Vanilla."

v. On or about April 22, 2009, **CRAIG ALLEN COREY II**, and other co-conspirators, used Craigslist to instruct sex customers to call a phone number subscribed to "CRAIG CORUY."

w. On or about April 22, 2009, **CRAIG ALLEN COREY II**, and other co-conspirators, posted a photograph of "Jane Doe 2" partially disrobed.

x. On or about April 23, 2009, **CRAIG ALLEN COREY II**, and other co-conspirators, posted an advertisement on Craigslist utilizing **COREY's** name, a phone number and address registered to a relative of **COREY**, an Internet Protocol address registered to **COREY** and offering "Jane Doe 2" for sexual services for a fee under the moniker "Vanilla."

y. On or about April 23, 2009, **CRAIG ALLEN COREY II**, and other co-conspirators, used Craigslist to instruct sex customers to call a phone number subscribed to “CRAIG CORUY.”

z. On or about April 23, 2009, **CRAIG ALLEN COREY II**, and other co-conspirators, posted a photograph of “Jane Doe 2” partially disrobed.

aa. In April 2009, **CRAIG ALLEN COREY II**, and others, received monies that had been exchanged for commercial sex acts with “Jane Doe 2.”

18 U.S.C. § 371.

COUNT TWO
(Interstate Transportation for Prostitution)

The Grand Jury for the District of Maryland further charges that:

1. The allegations set forth in Paragraphs 1 through ⁶8 and ¹⁸17 of Count One of this Indictment are incorporated by reference here.
2. From in or about January, 2009 through in or about April, 2009, in the District of Maryland and elsewhere, the defendants,

CRAIG ALLEN COREY II,
and
JACOB TYLER,

did knowingly and intentionally transport individuals in interstate and foreign commerce with the intent that such individuals engage in prostitution.

18 U.S.C. § 2421

18 U.S.C. § 2

COUNT THREE
(Enticement)

The Grand Jury for the District of Maryland further charges that:

1. The allegations set forth in Paragraphs 1 through ~~5~~⁶ and ~~17~~¹⁸ of Count One of this Indictment are incorporated by reference here.
2. From in or about January, 2009 through in or about April, 2009, in the District of Maryland and elsewhere, the defendants,

CRAIG ALLEN COREY II,
and
JACOB TYLER,

did knowingly persuade, induce, entice, and coerce individuals to travel in interstate and foreign commerce to engage in prostitution.

18 U.S.C. § 2422(a)
18 U.S.C. § 2

COUNT FOUR
(Sex Trafficking by Force, Fraud and Coercion)

The Grand Jury for the District of Maryland further charges that:

1. The allegations set forth in Paragraphs 1 through ⁶§ and ¹⁸17 of Count One of this Indictment are incorporated by reference here.

2. From in or about March 2009 through in or about April 2009, in the District of Maryland and elsewhere, the defendants,

CRAIG ALLEN COREY II,

did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain and maintain by any means a person, namely, “Jane Doe 1,” and did benefit, financially and by receiving anything of value, from participation in a venture engaged in such acts, knowing and in reckless disregard of the fact that force, fraud and coercion would be used to cause “Jane Doe 1” to engage in a commercial sex act.

18 U.S.C. § 1591(a)

18 U.S.C. § 2

COUNT FIVE
(Sex Trafficking by Force, Fraud and Coercion)

The Grand Jury for the District of Maryland further charges that:

1. The allegations set forth in Paragraphs 1 through ⁶8 and ¹⁸17 of Count One of this Indictment are incorporated by reference here.

2. From in or about March 2009 through in or about April 2009, in the District of Maryland and elsewhere, the defendants,

CRAIG ALLEN COREY II,
and
JACOB TYLER,

did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain and maintain by any means a person, namely, "Jane Doe 3," and did benefit, financially and by receiving anything of value, from participation in a venture engaged in such acts, knowing and in reckless disregard of the fact that force, fraud and coercion would be used to cause "Jane Doe 3" to engage in a commercial sex act.

18 U.S.C. § 1591(a)

18 U.S.C. § 2

COUNT SIX
(Sex Trafficking of a Minor)

The Grand Jury for the District of Maryland further charges that:

1. The allegations set forth in Paragraphs 1 through ⁶~~5~~ and ¹⁸~~17~~ of Count One of this Indictment are incorporated by reference here.

2. From on or about April 20, 2009 through on or about April 24, 2009, in the District of Maryland and elsewhere, the defendant,

CRAIG ALLEN COREY II,

did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain and maintain by any means a person, namely, "Jane Doe 2," and did benefit, financially and by receiving anything of value, from participation in a venture engaged in such acts, knowing and in reckless disregard of the fact that force, fraud and coercion would be used to cause "Jane Doe 2" to engage in a commercial sex act, and knowing and in reckless disregard that "Jane Doe 2" had not attained the age of 18 years and would be caused to engage in a commercial sex act.

18 U.S.C. § 1591(a)

18 U.S.C. § 2

COUNT SEVEN
(Distribution of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

1. The allegations set forth in Paragraphs 1 through ⁶~~5~~ and ¹⁸~~17~~ of this Indictment are incorporated by reference here.

2. From on or about April 20, 2009 through on or about April 23, 2009, in the District of Maryland and elsewhere, the defendant,

CRAIG ALLEN COREY II,

did knowingly distribute any visual depiction using any means and facility of interstate and foreign commerce, and that had been mailed, shipped and transported in and affecting interstate and foreign commerce, and which contained materials that had been so mailed, shipped and transported, by any means including by computer, and knowingly reproduce any visual depiction for distribution using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and through the mails, the production of which involved the use of a minor engaged in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), and such depiction being of such conduct, that is, the defendant posted to Craigslist visual depictions of "Jane Doe 2" engaging in sexually explicit conduct.

18 U.S.C. § 2252(a)

18 U.S.C. § 2

COUNT EIGHT
(Conspiracy to Distribute Narcotics)

The Grand Jury for the District of Maryland further charges that:

1. The allegations set forth in Paragraphs 1 through ⁶~~5~~ and ¹⁸~~17~~ of this Indictment are incorporated by reference here.

2. At some time between January, 2009 and September, 2009, in the District of Maryland, and elsewhere, the defendants,

CRAIG ALLEN COREY II,
and
JACOB TYLER,

did knowingly and intentionally combine, conspire, confederate and agree with others, known and unknown to the Grand Jury, to distribute and possess with intent to distribute a quantity of a mixture or substance containing a detectable amount of 3,4-Methylenedioxymethamphetamine (MDMA), also known as Ecstasy, a Schedule I controlled substance, and N-Benzylpiperazine, also known as BZP, a Schedule I controlled substance

21 U.S.C. § 846

21 U.S.C. § 841(a)(1)

COUNT NINE
(Distribution of BZP)

The Grand Jury for the District of Maryland further charges that:

On or about September 9, 2009, in the District of Maryland and elsewhere, the defendants,

CRAIG ALLEN COREY II,

did knowingly and intentionally distribute a quantity of a mixture or substance containing a detectable amount of N-Benzylpiperazine, also known as BZP, a Schedule I controlled substance.

21 U.S.C. §§ 841(a)(1)

18 U.S.C. § 2

FORFEITURE ALLEGATIONS

The Grand Jury further finds that:

1. As a result of the offenses alleged in this Indictment, the defendants shall forfeit to the United States:

- a. all property, real and personal, which constitutes and is derived from proceeds obtained, directly and indirectly, and traceable to the offenses;
- b. all property, real and personal, that was used and intended to be used, in any manner and part, to commit, facilitate and promote commission of the offenses; and
- c. all property, that constitutes and is derived from any proceeds obtained, directly and indirectly, as a result of the offense, and that is traceable to gross profits and other proceeds obtained from the offense.

2. The property forfeited shall include but not be limited to:

- a. A sum of money equal to the value of the proceeds of any of the offenses;
- b. A 2006 Chrysler 300, four-door, black in color, Ohio Registration: ECP 5049, Vehicle Identification Number: 2C3KK53G26H163377; and
- c. A 42" Sharp HDTV LCD

3. If any of the property described above, as a result of any act and omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred and sold to, and deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; and
- e. has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property.

18 U.S.C. §§ 981(a)(1)(C), 1594, 2253 and 2428

21 U.S.C. § 853

28 U.S.C. § 2461(c)

A TRUE BILL:

SIGNATURE REDACTED


ROD J. ROSENSTEIN
United States Attorney

DATE

1/14/10